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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Cynthia Solano,

Defendant

No. 2:23-cr-00408-GMS
**MOTION TO CONTINUE
SENTENCING**
(First Request)

Defendant (In-Custody), through undersigned counsel, respectfully requests that this Court continue the current Sentencing Date for a period of at least sixty (60) days from the current date of November 18, 2024.

Additional time is necessary because Defense Counsel is gathering mitigation materials in support of his forthcoming sentencing memorandum. In addition, the Mitigation Specialist (“Ms. DeSaye”) encountered delays in visiting with Defendant due to her expired clearance. Consequently, Ms. DeSaye will need additional time to research as well as interview individuals essential to Defendant’s mitigation. Lastly, Defendant is aware of her counsel’s request and agrees to waive any applicable time.

Defense counsel has contacted Assistant United States Attorney D. Matthew Conti concerning this motion and there is no objection to the requested continuance.

Excludable delay under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv) may result from this motion or from an order based thereon.

Respectfully submitted: October 30, 2024.

MATTHEW F. LEATHERS, P.C.

s/Matthew F. Leathers
Matthew F. Leathers
Attorney for Defendant